

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
	)	No. 2:19-cr-00013
v.	)	
	)	Chief Judge Crenshaw
	)	
GEORGIANNA A.M. GIAMPIETRO	)	

**AGREED JURY INSTRUCTIONS**

COMES NOW the United States of America, by and through its attorneys, the United States Attorney for the Middle District of Tennessee and the Chief of the Counterterrorism Section of the National Security Division, United States Department of Justice, and Charles Swift and Peter Strianse, counsel for defendant, and hereby respectfully submit this agreed set of jury instructions, attached hereto as Exhibit A. Where the parties cannot agree, each party is submitting its own proposals under separate cover.

The parties reserve the right to supplement or seek modification of these proposed instructions depending on the proof adduced at trial.

Respectfully Submitted,

MARK H. WILDSAIN  
United States Attorney  
Middle District of Tennessee

By: /s/ Kathryn Risinger  
KATHRYN RISINGER  
PHIL WEHBY  
Assistant United States Attorneys  
110 9<sup>th</sup> Avenue South  
Nashville, Tennessee 37203  
Phone: (615) 736-5151

/s/ Jennifer E. Levy  
JENNIFER E. LEVY  
Trial Attorney  
Counterterrorism Section  
U.S. Department of Justice  
950 Pennsylvania Avenue, N.W.  
Suite 7600  
Washington, D.C. 20530  
(202) 514-1092

Respectfully Submitted,

By: /s/ Charles Swift  
Charles D. Swift, Pro Hac Vice  
Attorney for GIAMPIETRO  
100 N. Central Expy., Suite 1010  
Richardson, TX 75080  
[cswift@clcma.org](mailto:cswift@clcma.org)